



PRACTICE WITH PURPOSE

November 14, 2014

United States District Clerk
United States Courthouse
600 East Harrison St., #101
Brownsville, TX 78520-7114

Via E-Filing (w/o enclosures)

Re: Cause No. B-08-446; *United States of America, ex rel. vs. Valley Baptist Health System, et al.*

Dear Clerk,

This firm represents Defendants Valley Baptist Health System and Valley Baptist Medical Center (collectively, "Valley Baptist") in the above-referenced litigation. On October 31, 2014, Judge Hanen ordered Valley Baptist to provide the Court for an *in camera* inspection the twenty-nine documents identified in Exhibit "A" of the relator's motion to compel. Judge Hanen ordered Valley Baptist to deliver those documents before Saturday, November 15, 2014.

After reviewing Judge Hanen's October 31, 2014 Order and the documents identified by the relator, Valley Baptist agrees to produce to the relator complete and unredacted copies of Document Nos. 1-4, 6-8, 12-14, 16, and 19.¹ After a diligent search, Valley Baptist was unable to locate Document Nos. 15, 17-18, and 22-24. The remaining documents can be disposed of as follows:

- Relator misidentified Document No. 5 as the "9/30/1998 VBMC Board of Trustee and Advisory Board Meeting Minutes." The correct date for Document No. 5 is September 30, 1999. Valley Baptist will produce to the relator the VBMC Board of Trustee and Advisory Board Meeting Minutes for September 30, 1999.
- Relator misidentified Document No. 10 as the "7/19/2002 Liason [sic] Committe [sic] Minutes." The correct date for Document No. 10 is February 19, 2002. Valley Baptist will produce to the relator the Liaison Committee Meeting Minutes for February 19, 2002.
- Relator misidentified Document No. 11 as the "7/28/2002 VBHS Meeting Minutes." The correct date for Document No. 11 is February 28, 2002. Valley Baptist will produce to the relator the VBHS Meeting Minutes for February 28, 2002.
- Document Nos. 9 and 28 are duplicative of Document No. 6, which Valley Baptist agreed to produce.
- Document No. 20 is duplicative of Document No. 1, which Valley Baptist agreed to produce.
- Document No. 21 is duplicative of Document No. 2, which Valley Baptist agreed to produce.
- Document No. 25 is duplicative of Document No. 3, which Valley Baptist agreed to produce.
- Document No. 26 is duplicative of Document No. 4, which Valley Baptist agreed to produce.
- Document No. 27 is duplicative of Document No. 5, which Valley Baptist agreed to produce.

¹ For a list of these documents and their corresponding Document Nos., please see Exhibit A.
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Ms. Cristina Sustaeta, Case Manager

United States District Clerk's Office

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- Document No. 29 is duplicative of Document No. 7, which Valley Baptist agreed to produce.

In sum, Valley Baptist is not withholding from the relator any of the twenty-nine documents he identified and which Judge Hanen ordered to be produced for an *in camera* inspection. Valley Baptist agrees to produce the documents without any redactions as previously anticipated. Therefore, Valley Baptist does not believe an *in camera* inspection is required. If this is not correct, please let me know.

I am sending a copy of this letter to the relator's counsel.

Sincerely,

Matthew S. Veech

cc: Ms. Cristina Sustaeta, Case Manager
United States District Clerk's Office
United States Courthouse
600 East Harrison St., #100
Brownsville, TX 78520

Via US First Class Mail (w/o enclosures)

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Via Federal Express (with enclosures)

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